

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Civil Action No.: 1:24-cv-00629-CCE-JLW**

KENYA TEASLEY,

Plaintiff,

v.

**TYLER TECHNOLOGIES, INC.; and
ABIGAIL DIAZ,**

Defendants.

**DECLARATION OF
ABIGAIL DIAZ IN SUPPORT OF
MOTION TO DISMISS**

Pursuant to 28 U.S.C. § 1746, the undersigned, Abigail Diaz, states as follows:

1. I am an adult citizen and resident of Falmouth, Maine, suffer no legal disabilities, and I have personal knowledge of the facts set forth in this declaration.
2. I have been employed by Tyler Technologies Inc. (“Tyler”) since 2012. I currently serve as the Chief Legal Officer for Tyler. I have held this position since 2017.
3. Tyler provides software and related services to the public sector. Tyler is not a North Carolina corporation. Tyler is incorporated in Delaware, and its principal place of business and headquarters are in Plano, Texas. Tyler has multiple offices throughout the United States and internationally. Tyler does not have an office or employees in North Carolina. During my entire employment with Tyler, I have worked out of Tyler’s Yarmouth, Maine office.
4. I have never resided in or worked in North Carolina. In my personal capacity, I have no offices, employees, or agents in North Carolina. I own no

property in North Carolina. I have never solicited, initiated, or engaged in business activity within North Carolina. I do not conduct regular or ongoing business in North Carolina, and I have never filed taxes in North Carolina.

5. I have only been to North Carolina twice that I can recall. On both occasions, once in 1999 and once in 2021, I passed through the state by car en route to a destination outside of North Carolina. I otherwise do not recall ever visiting North Carolina for business or personal reasons.

6. On or around April 30 and May 1, 2024, I received emails from Kenya Teasley alleging that Tyler had uploaded two criminal files which she alleged were “destroyed/expunged almost ten years ago.” Ms. Teasley demanded that I instruct Tyler to remove these files from eCourts, direct payment to her for alleged damages, and threatened to sue me in my individual capacity if I did not comply. I asked Tyler’s outside counsel to respond to Ms. Teasley.

7. I have had no involvement with inputting data into the North Carolina eCourts system, and I would not have any idea how to do it. No one at Tyler inputs data into the North Carolina eCourts system in the ordinary course of business. It is the users of the software (for example, court clerks) that input data into the eCourts system. To my knowledge, in this situation, the Durham County Clerk of Court’s Office is responsible for uploading Durham County, North Carolina court filings to eCourts.

8. I have never altered or removed any files or information from the North Carolina eCourts system, nor controlled which files or information are

viewable, and I do not have authority or knowledge to do so. No one at Tyler removes or alters files or information in the North Carolina eCourts system or has control over which files or information are viewable, in the ordinary course of business. Rather, the relevant clerk's office (here, Durham County Clerk of Court) has authority, along with other relevant, legally authorized North Carolina state actors, to upload, alter, or remove such files and information and to control which files and information are viewable.

9. I have never had any contractual relationship with Ms. Teasley, and Tyler has no contractual relationship with Ms. Teasley.

10. I have never interacted with Ms. Teasley. My only known connection with Ms. Teasley is being the recipient of the emails she sent to me in April and May of 2024.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on this 12th day of September, 2024.



Abigail Diaz